

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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IN RE BRISTOL-MYERS SQUIBB SECURITIES :
LITIGATION :
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Civil Action No. 00-1990 (SRC)

Return Date: June 6, 2005

**DECLARATION OF JAMES W. JOHNSON IN OPPOSITION
TO DEFENDANTS' MOTIONS TO STRIKE EXPERT TESTIMONY
AND IN SUPPORT OF LEAD PLAINTIFF'S CROSS-MOTION
TO STRIKE THE O'HARA AND STULZ DECLARATIONS**

JAMES W. JOHNSON declares as follows:

1. I am a member of Goodkind Labaton Rudoff & Sucharow LLP, attorneys for Lead Plaintiff, the Longview Collective Investment Fund, and the Class. I submit this Declaration in opposition to Defendants' Motions to Strike the Expert Testimony of Michael Barclay, Frank Torchio, Jonathan Benumof, Paul Stolley, Robert Uhl, Robert Nelson, Richard Grimm and Allan Detsky, and in support of Lead Plaintiff's Cross-Motion to Strike the O'Hara and Stulz Declarations, submitted herewith.

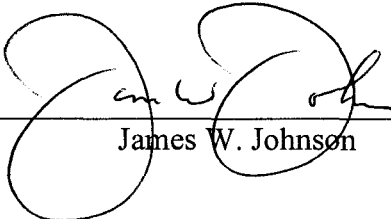
2. Accompanying this declaration are true and correct copies of the documents listed below.

Exhibit No.	Description
1	Errata to the Deposition Transcript of Michael J. Barclay
2	Errata to the Deposition Transcript of Jonathan L. Benumof
3	Errata to the Deposition Transcript of Allan Detsky
4	Errata to the Deposition Transcript of Richard Grimm
5	Errata to the Deposition Transcript of Robert C. Nelson
6	Errata to the Deposition Transcript of Paul Stolley
7	Errata to the Deposition Transcript of Frank Torchio
8	Errata to the Deposition Transcript of Robert H. Uhl
9	Affidavit of Michael J. Barclay
10	Affidavit of Frank Torchio
11	Declaration of Richard H. Grimm

Exhibit No.	Description
12	Letter Agreement Between Samira Shah and James W. Johnson, July 21, 2004
13	Allan S. Detsky, MD, PhD, <u>Are Clinical Trials a Cost-Effective Investment?</u> , JAMA, Vol. 262, Oct. 1989, pp. 1795-1800
14	Allan S. Detsky, MD, PhD, <u>Guidelines for Economic Analysis of Pharmaceutical Products</u> , a Draft Document for Ontario and Canada, PharmacoEconomics, 1993, pp. 354-361
15	Allan S. Detsky, MD, PhD, <u>Using Cost-Effectiveness Analysis to Improve the Efficiency of Allocating Funds to Clinical Trials</u> , Statistics In Medicine, Vol. 9, 1990, pp. 173-184
16	Allan S. Detsky's review of John Abramson's <u>Overdosed America: The Broken Promise of American Medicine</u> , JAMA, Vol. 293, Mar. 2005, pp. 1271
17	Email from D. Grant to J. Hatfield and others, May 19, 1999
18	Excerpts from <u>In Re Worldcom, Inc. Sec. Litig.</u>
19	George W. Torrance, <u>Canadian Guidelines for Economic Evaluation of Pharmaceuticals</u> , PharmacoEconomics, 1996, pp. 535-559
20	<u>In Re Frontier Insurance Group, Inc. Sec. Litig.</u>
21	Benumof Charts
22	Letter from Ministry of Health Ontario to A. Detsky, October 3, 1994
23	Letter from R. Walls to L. Benumof, July 20, 1998
24	M. Packer Presentation Slides, February 18, 2005
25	Marcia Kramer Mayer, Ph.D., National Economic Research Associates, <u>Best-Fit Estimation of Damaged Volume in Shareholder Class Actions: The Multi-Sector, Multi-Trader Model of Investor Behavior</u> , Oct. 2000
26	Ministry of Health Ontario, <u>Ontario Guidelines for Economic Analysis of Pharmaceutical Products</u> , Queen's Printer for Ontario, 1994
27	Niteesh K. Choudhry, MD, FRCPC, <u>A Perspective on US Drug Reimportation</u> , JAMA, Vol. 293, Jan. 2005, pp. 358-362

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of May, 2005 at New York, New York.


James W. Johnson